1

2

THE HONORABLE BARBARA J. ROTHSTEIN

3

4

5

6

7

8

9

10

11

12

1314

15

16

17 18

19

2021

22

2324

25

26

27

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JACOB ATKINSON, individually and on behalf of all others similarly situated,

Plaintiff,

v.

BURBERRY LIMITED, a foreign for profit corporation doing business as BURBERRY; and DOES 1 through 20,

Defendant.

Case No. 2:23-cv-01736-BJR

STIPULATED MOTION FOR EXTENSION OF TIME TO ANSWER OR RESPOND TO COMPLAINT AND DISCOVERY DEADLINES AND ORDER

Plaintiff Jacob Atkinson and Defendant Burberry Limited ("Burberry") respectfully, ask pursuant to Local Civil Rule 10(g), Local Civil Rule 7(d)(1), and this Court's Standing Order, for the Court to extend the upcoming pleading and discovery deadlines by 30 days to enable the parties additional time to explore a potential resolution of this action. The parties are participating in discussions in an attempt to resolve this matter without engaging in unnecessary litigation. Most recently, the parties finalized the terms of the CR 2A Agreement outlining a settlement structure, and Burberry has considered Plaintiff's economic and non-economic terms and proposed a counteroffer, and the parties require additional time to further engage one another in subsequent discussions about a potential resolution. Both parties thus stipulate as follows:

1	Burberry's time to answer or otherwise respond to Plaintiff's Complaint shall be		
2	extended by an additional 30 days from the current deadline of April 19, 2024 through and		
3	including May 20, 2024. To the extent Burberry files a dispositive motion in response to		
4	Plaintiff's Complaint, the parties agree to enter into a briefing schedule regarding same.		
5	lament s complaint, the parties agree to enter into a briefing schedule regarding same.		
6	The deadline for the parties to participate in an initial conference pursuant to Federal		
7	Rule of Civil Procedure 26(f) shall be extended from April 22, 2024 through and including May		
8	22, 2024.		
9	The deadline for the parties to exchange initial disclosures pursuant to Federal Rule of		
10	Civil Procedure 26(a)(1) shall be extended from April 29, 2024 through and including May 29,		
11	2024.		
12	2024.		
13	The deadline for the parties to submit a Joint Status Report shall be extended from May		
14	6, 2024 through and including June 5, 2024.		
15	Accordingly, both parties respectfully request that the Court find good cause to enter an		
16	order extending the upcoming pleading and discovery deadlines as set forth in this Stipulation		
17	and the proposed Order below.		
18	IT IS SO STIPULATED by and between the parties.		
19	DATED: April 19, 2024		
20	-	LANE POWELL P.C.	
21	EMERY REDDY, PLLC	LANE POWELL P.C.	
22	/s/Timothy W. Emery Timothy W. Emery, WSBA No. 34078	/s/Callie A. Castillo Callie A. Castillo, WSBA No. 38214	
23	Patrick B. Reddy, WSBA No. 34078	Dailey Koga, WSBA No. 58683	
24	Paul Capriani, WSBA No. 59991	1420 Fifth Avenue, Suite 4200	
2 4	600 Steward Street, Suite 1100 Seattle, WA 98101	Seattle, WA 98101 P: 206.223.7000	
25	P: 206.442.9106	F: 206.223.7107	
26	F: 206.441.9711	castilloc@lanepowell.com	
	emeryt@emeryreddy.com	kogad@lanepowell.com	
27	reddyp@emeryreddy.com		

1	paul@emeryreddy.com	/s/Ian Carleton Schaefer
2	Attorneys for Plaintiff Jacob Atkinson and the Class	Ian Carleton Schaefer, Esq.
3	ine Class	Katerina Mantell, Esq. SHEPPARD, MULLIN, RICHTER &
		HAMPTON LLP
4		30 Rockefeller Plaza New York, NY 10112
5		P: 212.653.8700
6		F: 212.653.8701 ischaefer@sheppardmullin.com
7		kmantell@sheppardmullin.com Attorneys for Defendant Burberry Limited
8		Interneys for Defendant Burberry Limited
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		

ORDER

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

Defendant's time to answer or otherwise respond to Plaintiff's Complaint shall be extended through and including May 20, 2024.

The deadline for the parties to participate in an initial conference pursuant to Federal Rule of Civil Procedure 26(f) shall be extended through and including May 22, 2024.

The deadline for the parties to exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) shall be extended through and including May 29, 2024.

The deadline for the parties to submit a Joint Status Report shall be extended through and including June 5, 2024.

DATED this 23rd day of April, 2024.

The Honorable Barbara J. Rothstein

Barbaran Pothetein